

WISHA Interim Operations Memorandum
Washington Department of Labor and Industries
#98-11-A
SPECIAL EMPHASIS PROGRAMS FOR LEAD AND SILICA

Approved: Michael Wood, Senior Program Manager **Date Issued:** November 30, 1998
WISHA Policy & Technical Services

Background

The work assignment tool for silica/lead reflects the collective efforts of field Industrial Hygiene Supervisors and WISHA Policy & Technical Services Staff. Approved for use only by the WISHA Industrial Hygiene enforcement staff, it is a supplement to the WAHEALTH target list and reflects the same basic targeting strategy.

The pool of employers was generated from several different sources in order to more effectively target the diverse industries with potential silica and lead overexposure. The sources include the federal OSHA special emphasis program, articles in safety and health literature, and the collective expertise of the Industrial Hygiene Supervisors.

Targeting within construction posed unique challenges because the four digit SIC codes are too broad and include a high percentage of establishments without the targeted hazards. SHIMS was used to generate lists of employers using risk classes or SIC codes, or combinations of risk classes and SIC codes and sources on the Internet were used to identify additional employers with potential silica and lead overexposure.

The list was first organized alphabetically, then ranked by generating a random number assignment for each. The list was then sorted by region, maintaining the random ranking already generated.

This interim memorandum describes the use of this targeting protocol by WISHA industrial hygiene enforcement staff and will remain in effect until a more formal directive is finalized or until superseded by another interim memo. It supersedes any previous guidance related to the lead and silica emphasis programs.

Policy

1. Industrial hygiene enforcement supervisors must ensure an appropriate balance of silica/lead assignments and other programmed industrial hygiene inspections.
 - a. The goal is to inspect at least half of the employers targeted under this lead/silica emphasis program in each region by the end of the federal fiscal year 1999 (ends September 30, 1999).
 - b. Regional staff are generally expected to work the list from the top down but may bypass an employer if prior inspection activity or local knowledge indicates that overexposure does not exist or that exposure is adequately controlled, or if the business has closed or is not within WISHA jurisdiction.

2. To the extent possible, regional supervisors should use Dodge reports or other sources of information to identify the location of construction sites where employers on the list are active. If it is not possible to identify a site without contacting the employer, such contact should be made at the employer's office and the inspection continued as soon as possible at an active work site where health hazards are most likely to exist. Unless regional staff have made such a contact at the employer's office, targeted employers must not be bypassed because active work sites could not be identified.
3. Likely lead and silica activity by employers not on the existing lists should also be targeted under this emphasis program. Dodge Reports and local knowledge should be used to identify other lead or silica work sites that cannot be targeted by other means (for example, a demolition or painting contractor performing work on a lead-painted bridge). Regional Industrial Hygiene Supervisors should set up standardized Dodge Reports within each region using search criteria most likely to uncover potential lead and silica exposures. Text search may be conducted using words or phrases such as sandblasting, blasting, concrete unit, conc unit, lead, seismic, etc.. Searches also can be conducted for work involving only tanks and bridges. IH Supervisors should run a report once a month and review it for possible work assignments.
4. Assignments under this emphasis program must use the Create Unprogrammed Work Assignment (CUWA) command in SHIMS. Supervisors should enter 'O' (other high hazard) for the incident type code on the assignment screen and enter 'S' (serious) for the seriousness code.
5. In completing the inspection reports, hygienists should mark the WISHA 1 inspection report 'programmed' and write WAHEALTH in box 25.C. They should then enter the appropriate tracking code(s) into box 42 of the WISHA 1 Inspection Report Form, using S 3 SIL or S 3 LEAD. If the presence of both substances is evaluated, use S 3 and both substance names, separated by a comma.